

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

LORIE DUFF

*Plaintiff,*

v.

FRONTIER AIRLINES, INC., AND  
ABM AVIATION, INC.  
*Defendants.*

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CASE NO. 4:20-cv-03430

DEFENDANT ABM AVIATION, INC.'S FIRST SUPPLEMENTAL  
RULE 26(a)(2)(A) EXPERT DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(2)(A), ABM Aviation, Inc. ("Defendant"), hereby files this First Supplemental Rule 26(a)(2)(A) disclosure and designates the following testifying expert:

I.

Defendant designates the following retained expert witness:

**Edward C. Murphy, M.D., P.A.**  
**Neurological Surgery**  
**Smith Tower**  
**6550 Fannin Street, Ste. 2323**  
**Houston, Texas 77030**  
**Telephone: (713) 795-4300**

Edward C. Murphy, M.D., P.A. is certified by the American Board of Neurological Surgery treating patients at the Texas Medical Center, Houston, Texas. As a neurological surgeon, Dr. Murphy specializes in treating herniated discs, peripheral nerve disorders, thoracic outlet syndrome, lower back pain, neck pain, and tumors. Dr. Murphy graduated from the University of Notre Dame in Notre Dame, Indiana, with a Bachelor of Science in electrical engineering, then completed graduate studies at Northwestern University Biomechanical Engineering Institute in Evanston, Illinois.

After completing his medical degree at Northwestern University, Dr. Murphy received his internship training at NorthShore University HealthSystem, previously Evanston Northwestern Healthcare. He completed his postgraduate fellowship at the National Hospital for Neurology and

Neurosurgery in London, England, then finished his residency training at Baylor College of Medicine's Department of Neurosurgery in Houston, Texas. Dr. Murphy has served on the clinical faculty in the Department of Neurological Surgery at Baylor College of Medicine, He currently is an adjunct professor at Texas Chiropractic College. He also serves as the associate medical director of Graduate Medical Education at St. Joseph Medical Center in Houston, Texas. Dr. Murphy maintains active membership in numerous professional organizations, including the American Medical Association, the American Association of Neurological Surgeons, and the Texas Association of the Hispanic American Medical Association of Houston Chapter and continues as a working member of the Peruvian Society of Neurosurgery.

Dr. Murphy is expected to testify that based upon his examination of the Plaintiff and thorough review of the medical records, the allegations made in Plaintiff's First Amended Complaint as to her injuries cannot be substantiated; that the physical examinations and radiographic imaging taken by Plaintiff's medical providers do not demonstrate any injuries as alleged; her lumbar situation is similar to her condition prior to March 5, 2020, that allowed her to function after nine lumbar surgeries. Her headaches are not related to a head injury, there was no physical evidence of any scalp or head trauma by examination, and there was no evidence of any significant loss of consciousness. Her right hip complaints and surgeries were not related to the March 5, 2020, incident. No future medical treatment or costs are needed or anticipated. Dr. Murphy may testify as to any such other matters within his professional field or experience pertaining to this lawsuit. In reaching his opinions and conclusions, Dr. Murphy will reply upon Plaintiff's medical records/radiographs, depositions, and records produced in accordance with any deposition or any deposition upon written questions. The following medical, billing, and radiological documents/images have been provided to Dr. Murphy for his review:

- Houston Fire Department/EMS
- Memorial Hermann Northeast Hospital
- Miller Chiropractic/Kent Miller, D.C.
- Houston MRI & Diagnostic Imaging
- Texas Center for Neurosciences/Remi Nader, M.D.
- Patient First Specialists/Wasyl William Fedoriw, M.D.
- Houston Spine & Rehabilitation Centers, Brett Baer, P.T., D.P.T., and Lenny Jue, M.D.
- Horizon Pain Management
- Signature RX
- Horizon DME, LLC (Pharmacy)
- Dallas Neurorehab Centers PLLC/Julian Osuji, Ph.D.
- Complete Surgery Houston Northwest/Mark Filley, M.D.
- Fondren Orthopedic Group, LLC/Mufaddal Gombera, M.D.
- Deposition of Missy Cannon
- Deposition of Lori Duff
- Examined Lori Duff on April 6, 2023
- All live pleadings in the case

For details concerning Dr. Murphy's experience and background, see Exhibit A which contains his curriculum vitae and bibliography. See Exhibit B for Dr. Murphy's Report. Defendant reserves the right to supplement this designation.

Defendant reserves the right to supplement this designation with additional designations of experts within any time limits imposed by the Court or any alterations of same by subsequent Court Order or agreement of the parties or pursuant to the Federal Rules of Civil Procedure and/or Federal Rules of Evidence.

Respectfully submitted,

ROSE LAW GROUP PLLC

/s/ Marc Michael Rose

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**COUNSEL FOR DEFENDANT**

**ABM AVIATION, INC.**

**CERTIFICATE OF SERVICE**

This is to certify that on June 6, 2023, a true and correct copy of the foregoing document was served by e-mail on:

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**COUNSEL FOR PLAINTIFF**

/s/ Marc Michael Rose  
Marc Michael Rose